

**SURETEC INSURANCE COMPANY**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**GUCCI AMERICA, INC.; BALENCIAGA S.A.;  
BALENCIAGA AMERICA, INC.; BOTTEGA  
VENETA S.A.; BOTTEGA VENETA INC, ET. AL.**

Plaintiffs,

BOND NO. 3372487

-against-

15 Civ. 03784

**ALIBABA GROUP HOLDING LTD.;  
ALIBABA.COM HONG KONG LTD.;  
ALIBABA.COM LTD.; ALIBABA.COM  
INVESTMENT HOLDING LTD.; ALIBABA.COM  
INVESTMENT LTD.; ALIBABA (CHINA)  
TECHNOLOGY CO., LTD.; ALIBABA.COM, INC.;  
TAOBAO HOLDING LTD.; TAOBAO CHINA  
HOLDING LTD.; TAOBAO (CHINA) SOFTWARE  
CO., LTD.; ALIPAY.COM CO., LTD.; BRAND  
BAG BOUTIQUE; YUN MI'S STORE; KOU KOU  
DAI (BUCKLE THE POCKET); EUROPE AND E  
NEWS; PICASSO TREND; LEHUI TEXTILE  
BEHALF; GUANGZHOU FEITENG JUNYE GIFTS  
MANUFACTURING CO., LTD. SHENZHEN LIN  
JUN LEATHER CO., LTD.; YIWU WIRBEST E-  
COMMERCIAL FIRM.; LUXURY 2000;**

Defendants.

**TEMPORARY  
RESTRAINING ORDER**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 7/28/15

WHEREAS, the above named Plaintiffs, **GUCCI AMERICA, INC.; BALENCIAGA S.A., BALENCIAGA AMERICA, INC.; BOTTEGA VENETA S.A., BOTTEGA VENETA, INC, ET. AL.**, have applied for a TEMPORARY RESTRAINING ORDER in the above entitled action, restraining the Defendants, **BRAND BAG BOUTIQUE; YUN MI'S STORE, KOU KOU DAI (BUCKLE THE POCKET); EUROPE AND E NEWS; PICASSO TREND; LEHUI TEXTILE BEHALF; GUANGZHOU FEITENG JUNYE GIFTS MANUFACTURING CO., LTD. SHENZHEN LIN JUN LEATHER CO., LTD.; YIWU WIRBEST E- COMMERCIAL FIRM, LUXURY 2000;**, from doing things as more fully set forth in the order granted by the Hon. P. Kevin Castle on July 9, 2014 under and by virtue of the Federal Rules of Civil Procedure upon the posting of an undertaking in the sum of *TEN THOUSAND AND 00/100 ( \$10,000.00 ) DOLLARS.*

Now, therefore, **SURETEC INSURANCE COMPANY**, duly licensed to transact business in the State of New York and having an office and principal place of business for the State of New York at 3033 5th Ave, #300, San Diego, CA, 92103, as Surety, does hereby undertake that the Plaintiffs, will pay to the Defendants, **BRAND BAG BOUTIQUE; YUN MI'S STORE, KOU KOU DAI (BUCKLE THE POCKET); EUROPE AND E NEWS; PICASSO TREND; LEHUI TEXTILE BEHALF; GUANGZHOU FEITENG JUNYE GIFTS MANUFACTURING CO., LTD. SHENZHEN LIN JUN LEATHER CO., LTD.; YIWU WIRBEST E- COMMERCIAL FIRM, LUXURY 2000;** so enjoined, such damages and costs not exceeding the sum of *TEN THOUSAND AND 00/100 ( \$10,000.00 ) DOLLARS* as they may sustain by reason of the Temporary Restraining Order, if the Court shall finally decide that the Plaintiffs were not entitled thereto; such damages and costs to be ascertained by a reference, or otherwise as the Court shall direct.

Dated: July 23<sup>rd</sup>, 2015  
New York, New York

**SURETEC INSURANCE COMPANY**

By

**WILLIAM J. PEDERSEN  
ATTORNEY-IN-FACT**

**RUBY J. KRAJICK  
CLERK OF COURT**

*approved on 7/28/15 as per order (occ. #19)  
dated 7/23/15.*

BY

**Deputy Clerk**

ACKNOWLEDGMENT OF SURETY

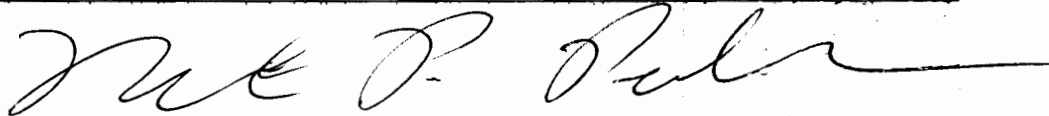
STATE OF NEW YORK  
COUNTY OF NEW YORK

SS:  
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On this 23<sup>rd</sup> day of July in the year 2015, before me, a Notary Public in and for said County, personally appeared **WILLIAM J. PEDERSEN**, personally known to me, who being by me duly sworn, did say that he is the aforesaid Attorney-in-Fact of the aforesaid Attorney-in-Fact of the **SURETEC INSURANCE COMPANY** of Houston, Texas, a corporation duly organized and existing under the laws of the State of Texas, that the seal affixed to the foregoing instrument is the corporate seal of said corporation, that the said instrument was signed, sealed and executed in behalf of said corporation by authority of its Board of Directors, and further acknowledge that the said instrument and the execution thereof to be voluntary act and deed of said corporation.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed by official seal the day and year last above written.

Neil P. Pedersen  
Notary Public, State of New York  
No. 01-PE6236258  
Qualified in New York County  
Commission Expires February 28, 2019



POA #: 3210003

# SureTec Insurance Company

## LIMITED POWER OF ATTORNEY

**Know All Men by These Presents**, That SURETEC INSURANCE COMPANY (the "Company"), a corporation duly organized and existing under the laws of the State of Texas, and having its principal office in Houston, Harris County, Texas, does by these presents make, constitute and appoint

Neil P. Pedersen, William J. Pedersen

its true and lawful Attorney-in-fact, with full power and authority hereby conferred in its name, place and stead, to execute, acknowledge and deliver any and all bonds, recognizances, undertakings or other instruments or contracts of suretyship to include waivers to the conditions of contracts and consents of surety for:

Two Million and 00/100 Dollars (\$2,000,000.00)

and to bind the Company thereby as fully and to the same extent as if such bond were signed by the President, sealed with the corporate seal of the Company and duly attested by its Secretary, hereby ratifying and confirming all that the said Attorney-in-Fact may do in the premises. Said appointment shall continue in force until 12/31/2016 and is made under and by authority of the following resolutions of the Board of Directors of the SureTec Insurance Company:

*Be it Resolved*, that the President, any Vice-President, any Assistant Vice-President, any Secretary or any Assistant Secretary shall be and is hereby vested with full power and authority to appoint any one or more suitable persons as Attorney(s)-in-Fact to represent and act for and on behalf of the Company subject to the following provisions:

*Attorney-in-Fact* may be given full power and authority for and in the name of and of behalf of the Company, to execute, acknowledge and deliver, any and all bonds, recognizances, contracts, agreements or indemnity and other conditional or obligatory undertakings and any and all notices and documents canceling or terminating the Company's liability thereunder, and any such instruments so executed by any such Attorney-in-Fact shall be binding upon the Company as if signed by the President and sealed and effected by the Corporate Secretary.

*Be it Resolved*, that the signature of any authorized officer and seal of the Company heretofore or hereafter affixed to any power of attorney or any certificate relating thereto by facsimile, and any power of attorney or certificate bearing facsimile signature or facsimile seal shall be valid and binding upon the Company with respect to any bond or undertaking to which it is attached. (Adopted at a meeting held on 20<sup>th</sup> of April, 1999.)

**In Witness Whereof**, SURETEC INSURANCE COMPANY has caused these presents to be signed by its President, and its corporate seal to be hereto affixed this 21st day of March, A.D. 2013.

SURETEC INSURANCE COMPANY

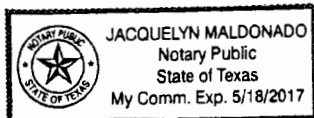
By: [Signature]  
John Knox Jr., President

State of Texas  
County of Harris

ss:



On this 21st day of March, A.D. 2013 before me personally came John Knox Jr., to me known, who, being by me duly sworn, did depose and say, that he resides in Houston, Texas, that he is President of SURETEC INSURANCE COMPANY, the company described in and which executed the above instrument; that he knows the seal of said Company; that the seal affixed to said instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said Company; and that he signed his name thereto by like order.



[Signature]

Jacquelyn Maldonado, Notary Public  
My commission expires May 18, 2017

I, M. Brent Beaty, Assistant Secretary of SURETEC INSURANCE COMPANY, do hereby certify that the above and foregoing is a true and correct copy of a Power of Attorney, executed by said Company, which is still in full force and effect; and furthermore, the resolutions of the Board of Directors, set out in the Power of Attorney are in full force and effect.

Given under my hand and the seal of said Company at Houston, Texas this 203 day of July, 2015, A.D.

[Signature]  
M. Brent Beaty, Assistant Secretary

Any instrument issued in excess of the penalty stated above is totally void and without any validity.  
For verification of the authority of this power you may call (713) 812-0800 any business day between 8:00 am and 5:00 pm CST.



SureTec Insurance Company  
1330 Post Oak Blvd., Suite 1100  
Houston, TX. 77056

FINANCIAL STATEMENT  
as of December 31, 2014  
Statutory Basis

Bonds	\$ 130,026,011	Reserve for Losses and Loss Expense	\$ 9,067,922
Stocks	13,339,879	Reserve for Unearned Premiums	27,021,031
Cash & Short Term Investments	21,547,103	Other Liabilities	57,612,454
Agents Balances or Uncollected Premiums	5,973,198	TOTAL LIABILITIES	93,701,407
Other Admitted Assets	4,699,484		
		Capital Stock	5,000,000
		Surplus	76,884,268
		TOTAL POLICYHOLDERS SURPLUS	81,884,268
		TOTAL LIABILITIES AND POLICYHOLDERS SURPLUS	\$ 175,585,675
TOTAL ASSETS	\$ 175,585,675		

Bonds and stocks are valued in accordance with the basis adopted by the National Association of Insurance Commissioners.  
Securities carried in the above statement are deposited as required by law.

CERTIFICATE

David Allen Wisnoski, Treasurer, and Matthew Brent Beaty, Assistant Secretary, of the SureTec Insurance Company, being duly sworn each for himself, deposes and says that they are the above described officers of the said Company and that on the 31st day of December, 2014, the Company actually possessed the assets set forth in the foregoing financial statement, except as hereinbefore indicated, and that the foregoing statement is a correct exhibit of such assets and liabilities of said Company on the 31st day of December, 2014, according to the best of their information, knowledge and belief.

Treasurer

Assistant Secretary

STATE OF TEXAS  
COUNTY OF HARRIS

On this 3rd day of March, 2015, before me came the above named officers of SureTec Insurance Company to me known to be the individuals and officers described herein, and acknowledge that they executed the foregoing instrument and affixed the seal of the corporation thereto by the authority of their office.

Notary Public

